

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

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[Response to Docket # 17640]

**JOINT INFORMATIVE MOTION OF DISCOVERY DISPUTE BETWEEN INDIVIDUAL
GO BONDHOLDER (ARTHUR SAMODOVITZ) AND THE FOMB/FAFAA**

Dated: September 20, 2021

The Court is hereby notified of a discovery dispute between Arthur Samodovitz, individual bondholder of the 2014 Puerto Rico GO Bonds, and the Financial Oversight and Management Board for Puerto Rico ("FOMB") and the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF", and together with the FOMB, the "Government Parties") regarding the Second Set of Requests for Production of Documents and Interrogatories propounded by Arthur Samodovitz, and a presumed discovery dispute between the same parties regarding the Third Set of Requests for Production of Documents and Interrogatories propounded by Arthur Samodovitz.

Arthur Samodovitz served his (first) Set of Requests for Production of Documents and Interrogatories on the Government Parties by email the evening of Friday 8/27/2021 and Arthur Samodovitz promptly withdrew them on Sunday 8/29/2021 when he saw a public document that provided some of the requested information.

Arthur Samodovitz served his Second Set of Requests for Production of Documents and Interrogatories on the Government Parties on Monday 9/6/2021. On Monday 9/13/2021, the Government Parties served their responses and objections to the

Requests for Production of Documents in the Second Set for a variety of reasons including relevance. A discovery conference was held on Tuesday 9/14/2021 and the parties could not agree on the issue of relevance. However, the Government Parties requested until Friday 9/17/2021 to look for publicly available documents that would satisfy these requests. The parties agreed that, if Arthur Samodovitz believed the parties were at impasse after the Government Parties' response on Friday 9/17/2021, there would be a hearing. On Friday, 9/17/2021 the Government Parties reported that they found no publicly available documents that responded to the Requests for Production of Documents in the Second Set, and therefore, stood by their 9/13/2021 responses and objections.

On Thursday 9/16/2021, the Government Parties also served their responses and objections to the Interrogatories in the Second Set which requested similar information as that contained in documents requested in the Requests for Production of Documents in the Second Set, and Arthur Samodovitz requested a discovery conference on Friday 9/17/2021. The Government Parties instead recommended a hearing for both the Requests for Production of Documents and Interrogatories in the Second Set because their responses and objections to the Interrogatories were consistent with those to the Requests for Production of Documents. On Monday 9/20/2021, Stephanie Caruso scheduled the hearing for Friday 9/24/2021.

On Thursday 9/16/2021, Arthur Samodovitz also served a Third Set of Requests for Production of Documents and Interrogatories by email on the Government Parties. This Third Set is directed to similar issues as the Second Set. The response to the Requests for Production of Documents in the Third Set is due Thursday 9/23/2021, and the Interrogatories in the Third Set request similar information as in the Requests for Production of Documents in the Third Set. The Government Parties' responses to the Third Set of Requests for Production of Documents and Interrogatories are not yet due. Mr. Samodovitz believes it would be expeditious to consider both the Second and Third Sets in the same hearing.

September 20, 2021

Respectfully Submitted, /s/ Arthur Samodovitz, pro se.
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